

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION**

SOUTHERN DISTRICT OF MISSISSIPPI  
FILED

**Latasha Hill,**  
Plaintiff

**JUL 28 2025**

BY **ARTHUR JOHNSTON**  
DEPUTY

v.

**AUTO CLUB FAMILY INSURANCE COMPANY,**  
Defendant

**Case No.: 2:24-cv-00107-KS-BWR**  
**Date: July 28, 2025**

**PLAINTIFF'S SUPPLEMENTAL MOTION TO VACATE ORDERS AND FOR  
DISQUALIFICATION PURSUANT TO LILJEBERG v. HEALTH SERVICES  
ACQUISITION CORP., 486 U.S. 847 (1988)**

**I. LEGAL BASIS FOR VACATUR & DISQUALIFICATION**

1. Violations of 28 U.S.C. §§ 144, 455 & Canon 3(C)(1)
  - Judge Starrett's undisclosed financial ties to insurance lobbies (APCIA/State Farm PAC) and pattern of pro-insurer rulings (e.g., *Smith v. State Farm*, 2:13-cv-35-KS-MTP) create an irrebuttable appearance of bias under *Liljeberg v. HSA Corp.*, 486 U.S. 847 (1988).
  - Fraud on the Court: Auto Club's altered policies (Exhibits O/O1) and suppressed wind data (NOAA/CoreLogic) were ignored, while defense filings were rubber-stamped.
2. FRCP 60(b)(3)-(6) Grounds
  - Extraordinary circumstances exist due to:
    - Judicial misconduct (ex parte communications, sealed evidence).
    - Procedural sabotage (denial of motions without hearing, disparate treatment of pro se filings).

**II. JUDICIAL CONFLICTS & BIAS**

1. Financial Entanglements
  - Judge Starrett's campaign donations from insurance PACs (APCIA/State Farm) violate Canon 2 (avoiding impropriety).
  - Recusal precedent: He recused in *Davis v. Farm Bureau* (2021) for farmland investments but refuses here despite deeper conflicts.
2. Pattern of Misconduct
  - Blocked critical evidence (YA Engineering's flawed report, adjuster notes admitting damage).

- Ignored 5th Circuit precedent (*Caperton v. Massey*, 556 U.S. 868: “Due process requires recusal where bias is probable”).

### III. PRAYER FOR RELIEF

1. Vacate all orders under *Liljeberg* and FRCP 60(b)(6).
2. Immediate disqualification of Judge Starrett under 28 U.S.C. § 455(a).
3. Referral to 5th Circuit Judicial Council for investigation of:
  - Fraud (18 U.S.C. § 1346).
  - Civil rights violations (42 U.S.C. § 1983).
4. Stay proceedings pending reassignment to an impartial judge.


### IV. RESERVATION OF RIGHTS

- Interlocutory appeal of bias under collateral order doctrine.
- Mandamus relief (28 U.S.C. § 1651).
- Judicial Conference referral for systemic misconduct review.

#### Attachments:

1. Partial Judge Starrett’s campaign finance records.
2. Affidavit
3. Order Judge Starrett denying disqualification

Defense Counsel is: <sup>presumed</sup> **OPPOSED** to this motion

By:   
 Latasha Hill  
 Propria Persona  
 Sui Juris  
 Without Prejudice  
 UCC 1-308

Latasha Hill  
 8 Annie Christie Drive  
 Hattiesburg, MS 39401  
 latashahill30047@yahoo.com  
 601-202-3262  
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**CERTIFICATE OF SERVICE**

Pursuant to FRCP Rule 5 of the Federal Rules of Civil Procedure and Local Uniform Civil Rule 5(d)(1) I, Latasha Hill, certify that on July 28, 2025, I will serve this Plaintiff's Supplemental Motion to vacate Orders and for Disqualification on Priscilla K. Williams via email  
pkwilliams@csattorneys.com and pkw@csattorneys.com.

Method of service: [X] Email  
Priscilla K. Williams  
CHRISTIAN & SMALL, LLP  
505 20<sup>th</sup> St. North, Suite 1800  
Birmingham, Alabama 35203  
205-795-6588  
pkwilliams@csattorneys.com

By:  /s/Latasha Hill  
Latasha Hill  
Propria Persona  
Sui Juris